



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604**

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Chicago Rail and Port, Chicago, IL

FROM: Meaghan Pashen, Environmental Engineer
AECAB (MN/OH)

THRU: Brian Dickens, Section Supervisor
AECAB (MN/OH)

TO: File

BASIC INFORMATION

Facility Name: Chicago Rail and Port, LLC

Facility Location: 3245 E 103rd Street, Chicago, IL 60617

Date of Inspection: October 20, 2022

EPA Inspector(s):

1. Meaghan Pashen, Environmental Engineer
2. Patrick Miller, Environmental Engineer

Other Attendees:

1. Austin Zenere, Facility Manager

Contact Email Address: azenere@zforcetransportation.com

Purpose of Inspection: To determine compliance with applicable Illinois State Implementation Plan (SIP) requirements, including fugitive particulate matter (PM).

Facility Type: Bulk solid material handling facility

Regulations Central to Inspection: IL SIP Rule 201.141, which states that no person shall cause the discharge or emissions of any contaminant into the environment...so as to cause or tend to cause air pollution in Illinois (paraphrased), and IL SIP Rule 212.301, which states that fugitive emissions cannot cross the property line of the facility (paraphrased).

Arrival Time: 09:45 AM

Departure Time: 11:20 AM

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☐ Provided Small Business Resource Information Sheet
- ☒ Small Business Resource Information Sheet not provided. Reason: Provided with Inspection Report
- ☒ Provided CBI warning to facility

The following information was obtained verbally from Austin Zenere unless otherwise noted.

Process Description:

Chicago Rail and Port, LLC (the Facility) is a bulk solid material handling and clean construction debris transfer facility. "Clean residential debris" in the form of a concrete and dirt debris mix, enter the Facility via barge and truck. At the Facility entrance, trucks are weighed, and loads are inspected using a photoionization detector (PID). Receipts that do not pass inspection are denied entrance to the Facility. Materials are then placed in two sperate "bins" or pile locations, one for clean construction or demolition debris (CCDD), mainly concrete, stone and sand, and one for dirt to be sent to an Indiana location. Materials are sorted using a grizzly screener and a skeleton bucket. Prior to shipment, materials are again inspected using a PID. The materials exit the Facility via barge and truck.

Staff Interview:

The Facility typically operates from 7:00 AM to 3:00 PM, Monday through Friday. About 45 to 60 trucks enter the Facility per day.

Upon entrance to the Facility, trucks that do not have a valid paperwork or have loads containing metal are rejected. The first truck typically arrives at approximately 8:00 AM, and the last typically arrives at approximately 2:30 PM. The maximum pile height at the Facility is 20 feet. Barges take about 2 hours to load and hold a maximum of 1,500 tons of material. A barge can hold about 75 truckloads.

Upon exit from the Facility, trucks pass through rumble strips and a wheel wash. There are plans for a speed bump to be installed at the Facility exit before the wheel wash.

IL SIP Rule 201.141 states that no person shall cause the discharge or emissions of any contaminant into the environment so as to cause or tend to cause air pollution in Illinois. The

Facility follows a fugitive dust plan to control emissions. Method 22 and Method 9 visual emission observations are taken daily. A water truck equipped with a hose for spraying piles is used to wet roads and piles daily. Water truck logs are kept. At the end of the day, finer piles are sprayed with water. A street sweeper is required to be used for every 100 trucks to enter the Facility. The street sweeper is used daily, typically at midday, according to Mr. Zenere. EPA requested the visual emission check logs and water truck logs for the dates 5/20/22, 5/31/22, 6/15/22, 6/21/22, and 6/30/22.

There are five PM monitor stations onsite along the Facility fenceline. The five stations are Northeast, Northwest, Southeast, Southwest, and Central, respective to locations at the Facility's fenceline. There is a weather station at the Northwest monitoring location. The weather station undergoes an out of service inspection every 2.5 years, which occurred this month.

Filter maintenance occurs biweekly and quarterly at each monitor. The monitors operate continuously, and measurements are taken every 15 minutes. The monitors run a self-test once every two weeks. Regular checks are performed by Facility staff at monitors to ensure data accuracy and consistency, including checks for flow and "k factor". EPA requested operation manuals for the five PM monitors onsite.

The Facility installed and received a permit approval for a crusher for concrete this year, but it is not yet in operation. The Facility expects the crusher to be in use Spring 2023. The crusher is equipped with water spray bars for PM control. The crusher operations are to occur at the north end of the Facility. EPA requested the proposed Facility map including crusher operations.

The Facility does not have an air permit. The Facility has a National Pollutant Discharge Elimination System (NPDES) permit.

TOUR INFORMATION

EPA Tour of the Facility: Yes

Data Collected and Observations:

EPA observed the PM monitoring stations onsite, which are Northeast, Northwest, Southeast, Southwest, and Central. The ambient air concentration readings for PM₁₀ at the monitors were 15 µg/m³, 51 µg/m³, 0 µg/m³, 10 µg/m³, and 8 µg/m³, respectively. The flow reading at all five monitors was 2.0 liters per minute (lpm). EPA requested data from the five PM monitors for the dates 5/20/22, 5/31/22, 6/15/22, 6/21/22, and 6/30/22.

IL SIP Rule 212.301 states that fugitive emissions cannot cross the property line of a facility. EPA observed no fugitive PM emissions at the Facility, and no PM emissions crossing the Facility's property line. EPA observed the daily water truck log. EPA observed the water truck apply water to roads.

Photos and/or Videos: were taken during the inspection.

Field Measurements: were not taken during this inspection.

CLOSING CONFERENCE

- ☒ Provided U.S. EPA point of contact to the facility

Requested documents:

- Operation manuals for the five PM monitors onsite (Northwest, Northeast, Central, Southeast, and Southwest). One copy is good if the monitors are all the same make and model.
- Map of the facility, both current and proposed
- For the dates 5/20/22, 5/31/22, 6/15/22, 6/21/22, and 6/30/22:
 - Water truck logs
 - Visual emission check logs (Method 22 and Method 9)
 - Record of shipments (including materials information)
 - Record of receipts (including materials information)
 - Meteorological data
 - All data from the five PM monitors

DIGITAL SIGNATURES

Report Author: _____

Section Supervisor: _____

Facility Name: Chicago Rail and Port

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APPENDICES AND ATTACHMENTS

- 1.* Appendix A – Digital Image Log

Facility Name: Chicago Rail and Port
Facility Location: 3245 E 103rd Street, Chicago, IL 60617
Date of Inspection: October 20, 2022

APPENDIX A: DIGITAL IMAGE LOG

1. Inspector Name: Patrick Miller	2. Archival Record Location: R5 Records Center
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Image Number	File Name	Date and Time (incl. Time zone and DST)	Description of Image
1	IMG_0243.JPG	*	Northeast monitoring station
2	IMG_0244.JPG	*	Central monitoring station
3	IMG_0245.JPG	*	Southeast monitoring station
4	IMG_0246.JPG	*	Bins with stone
5	IMG_0247.JPG	*	Area of future crusher operations
6	IMG_0248.JPG	*	Receiving area
7	IMG_0249.JPG	*	First dump pile
8	IMG_0250.JPG	*	Skeleton bucket
9	IMG_0251.JPG	*	Screened concrete
10	IMG_0252.JPG	*	Screened dirt
11	IMG_0253.JPG	*	Grizzly screener
12	IMG_0254.JPG	*	Barge filled with dirt
13	IMG_0255.JPG	*	Southwest monitoring station
14	IMG_0256.JPG	*	Northwest monitoring station (facing North)
15	IMG_0257.JPG	*	Northwest monitoring station (facing North)

*Metadata for date and time did not preserve on digital camera.